

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.  
SECURITIES LITIGATION

Civil Action No. 4:19-cv-00957

**CLASS PLAINTIFFS' UNOPPOSED MOTION TO SEAL (1) EXHIBIT C  
TO CLASS PLAINTIFFS' REQUEST FOR JUDICIAL NOTICE  
AND MOTION FOR AN ORDER DEEMING CERTAIN ADMITTED  
FACTS ESTABLISHED, AND (2) EXHIBIT C TO THE DECLARATION  
OF STEPHEN JOHNSON IN SUPPORT OF CLASS PLAINTIFFS'  
REQUEST FOR JUDICIAL NOTICE AND MOTION FOR AN ORDER  
DEEMING CERTAIN ADMITTED FACTS ESTABLISHED**

Class Plaintiffs in the above-captioned action respectfully request leave to file under seal unredacted copies of: (1) Exhibit C to Class Plaintiffs' Request for Judicial Notice and Motion for an Order Deeming Certain Admitted Facts Established, and (2) Exhibit C to the Declaration of Stephen Johnson in Support of Class Plaintiffs' Request for Judicial Notice and Motion for an Order Deeming Certain Admitted Facts Established (collectively, "Sealed Documents").

As grounds for this motion, Class Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order ("PO"), which governs the handling of confidential information exchanged in discovery in this matter;

2. Pursuant to the PO, "[i]f any party submits Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission must be filed only under seal on CM/ECF if filed electronically[.]" PO at ¶ 24;

3. The Sealed Documents comprise and refer to non-public documents and information that have been designated by the parties as Confidential Discovery Material pursuant to the PO; and

4. On October 11, 2024, Class Plaintiffs filed the Sealed Documents under seal. Pursuant to ¶ 14 of the PO, Class Plaintiffs will meet and confer with the designating party to determine whether any or all of the Sealed Documents need to remain under seal no later than October 18, 2024.<sup>1</sup>

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<sup>1</sup> Class Plaintiffs hereby certify, in accordance with Court Procedures § 6.C.2, that Class Plaintiffs met and conferred with HPS and HPS confirmed it does not oppose the motion.

THEREFORE, Class Plaintiffs request that the Court grant their request for leave to file under seal unredacted copies of the Sealed Documents.

DATED: October 11, 2024

Respectfully submitted,

s/ Andrew J. Entwistle

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**CERTIFICATE OF SERVICE**

I certify that this motion has been served on counsel of record via the Court's ECF system on October 11, 2024.

s/ Andrew J. Enwistle  
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ANDREW J. ENTWISTLE